REMARKS

Favorable reconsideration of this application, in light of the preceding amendments and following remarks, is respectfully requested.

Claims 1-9 are pending in this application. By this Amendment, the claim 1 is amended; and claim 9 is added. No new matter is added. Claim 1 is the sole independent claim.

Entry of After Final Amendment

Entry of this amendment is proper under 37 CFR §1.116 since the amendments: (a) place the application in condition for allowance for the reasons discussed herein; (b) do not raise any new issues requiring further search and/or consideration since the amendments amplify issues previously discussed throughout prosecution; (c) do not present any additional claims without canceling a corresponding number of finally rejected claims; and (d) place the application in better form for appeal, should an appeal be necessary. Entry of the Amendment is thus respectfully requested.

Claim Rejections - 35 U.S.C. § 102

Claims 1-8 are rejected under 35 U.S.C. § 102(b) as being anticipated by US Patent No. 5,774,546 (hereinafter, "Handelman"). Applicants respectfully traverse this rejection for the reasons discussed below.

Applicants respectfully submit that the Handelman reference fails to disclose or suggest, *inter alia*, "**inserting by the user unit, of a data block in the blocks transmitted by the second security module to the management center, the data**

block includes the identifier of the first security module and the stored data specific to the first security module," as recited in claim 1.

In particular, Applicants respectfully submit that the Handelman reference does not teach or suggest the inserting step executed by the user unit which is related to the communication with *the management center*.

Instead, col. 4, lines 32-39 of the Handelman reference discloses:

> Card read/writer 50 includes two card sensors 52 and 54, a multiplexer/demultiplexer (MUX/DEMUX) 60, a CPU 62 and a memory 64. Card sensors 52 and 54 detect the existence of smart cards 56 and 58 in the respective card receptacles. Card sensors 52 and 54 also read data stored in the smart cards 56 and 58 and provide it to MUX/DEMUX 60. MUX/DEMUX 60 provides multiplexed data received from both smart cards 56 and 58 to a CPU 62 and a memory 64.

In other words, Handelman reference merely discloses a card reader/writer 50 to detect the existence of smart cards 56 and 58. There is no "management center" for data blocks transmitting by the second security module.

Moreover, in the outstanding Final Office Action, the rejection states that col. 3, line 66 – col. 4, line 8 of the Handelman reference discloses the "inserting" step.[1] Applicants respectfully submit, however, that col. 3, line 66 – col. 4, line 8 merely states that "[w]hen the subscriber receives a new main card and places it in card receptacle 24, the parent card automatically starts an initialization algorithm which employs two way communication between the parent card and the new main card to provide authentication, verification, validation or a combination thereof of the main card." That is, the communication is between the parent card and the new main card, rather than the second security module and the "*management center*." Further, the

Handelman reference discloses that the specific data are passed from the old main card to the new main card, and in no way sent by the user unit while specific data of the new main card are sent to *the management center*.

Accordingly, the Handelman reference fails to disclose, or even suggest, **"inserting by the user unit, of a data block in the blocks transmitted by the second security module to the management center, the data block includes the identifier of the first security module and the stored data specific to the first security module,"** as recited in claim 1.

Therefore, contrary to the Examiner's contention, the Handelman reference does not disclose or suggest each and every element of claim 1.

Since the Handelman reference fails to disclose each and every element of claim 1, it cannot provide a basis for a rejection under 35 U.S.C. § 102(b) and, thus, is allowable. Claims 2-8 depend from amended claim 1 and, therefore, allowable for the similar reasons discussed above with respect to claim 1.

For at least these reasons, the Examiner is respectfully requested to reconsider and withdraw the § 102(b) rejection of claims 1-8.

New Claim

Claim 9 has been added in an effort to provide further, different protection for Applicants' invention. Claim 9 is allowable for at least by its virtue that it is dependent on claim 1. No new matter is added.

Further, the Handelman reference cannot disclose the features of claim 9. In particular, the card reader temporarily stores the data that are then transferred to the

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[1] See Final Office Action mailed December 16, 2008, page 3, 6th para.

other module, *i.e.*, when the security module is removed from the card reader, no data are present in the user unit.

Request for Interview

Applicants respectfully request, prior to the issuance of an action on the merits, that the Examiner grant an interview (in-person or telephonic) with Applicants' representative in order to discuss the Office Action, and the differences between the cited prior art and the subject matter cited in the claims.

Applicants' representative will telephone the Examiner in the near future in an attempt to schedule this personal interview. However, as Applicants' representative cannot anticipate when this action will be scheduled for further action by the Examiner, it is requested that the Examiner contact Applicants' representative by telephone, at the number given below should a specific date for the interview have not been scheduled when the Examiner takes this action up for further action. Every effort will be made to meet the Examiner's scheduling preference.

CONCLUSION

In view of the above remarks and amendments, Applicants respectfully submit that each of the pending objections and rejections has been addressed and overcome, placing the present application in condition for allowance. A notice to that effect is respectfully requested. Further, the above remarks demonstrate the failings of the outstanding rejections, and are sufficient to overcome the rejections. However, these remarks are not intended to, nor need they, comprehensively address each and every reason for the patentability of the claimed subject matter over the applied prior art.

Accordingly, Applicants do not contend that the claims are patentable solely on the basis of the particular claim elements discussed above.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned, at the telephone number below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

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By

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